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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

 Plaintiffs,

 v.
 META PLATFORMS, INC.,

 Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE
 IN OPPOSITION TO OMNIBUS MOTION
 TO SEAL MATERIALS SUBMITTED IN
 CONNECTION WITH CLASS
 CERTIFICATION AND *DAUBERT*
 BRIEFING AND MERITS EXPERT
 PROFFERS IN THE ADVERTISER CASE**

I, Brian J. Dunne, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

2. This declaration is made in opposition to the Omnibus Motion to Seal Materials Submitted in Connection with the Class Certification and Daubert Briefing in the Advertiser case (“Sealing Motion”).

3. The specific information Meta seeks to seal and the reason each should not be sealed are identified in the tables below, with numbered rows for the Court’s ease of reference:

| Row No. | Dkt. No. | Portion of Document Sought to Be Sealed, If Applicable | Basis for Not Sealing |
|---------|----------|--|--|
| 1 | 795-01 | 7:2-4, between “in late 2018” and “—e.g.,” | [Document: Advertisers’ Class Certification Motion] Old – Date: late 2018 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 2 | 795-01 | 7:5, after “exploit—” through end of sentence | [Document: Advertisers’ Class Certification Motion] Old – Date: late 2018 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 3 | 795-01 | n. 13, parenthetical after “See Ex. 6 (PX 2989) at 435-36” | [Document: Advertisers’ Class Certification Motion] Old – September 2017 There is a significant public interest in this |

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| | | | conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 4 | 795-01 | 7:18-8:1, between “with Ticketmaster as” and “and a May 30, 2017” | [Document: Advertisers’ Class Certification Motion] Old – from March 21, 2016, document (last updated February 13, 2018) |
| 5 | 795-01 | 8:2, after “restricting Ticketmaster from” through end of line | [Document: Advertisers’ Class Certification Motion] Old – from May 30, 2017 |
| 6 | 795-01 | 8:4-8:7, between “restricting Apple from” and “and a July 12, 2017” | [Document: Advertisers’ Class Certification Motion] Old – from January 15, 2012 contract |
| 7 | 795-01 | 8:8-8:9, after “Apple and Meta” through end of line | [Document: Advertisers’ Class Certification Motion] Old – from July 12, 2017 Side Agreement |
| 8 | 795-01 | n. 27, between “showing” and “budget reduction” | [Document: Advertisers’ Class Certification Motion] Old – from October 2018 presentation for 2019 budget |
| 9 | 795-01 | n. 27, between “content, with a” and “and an additional” | [Document: Advertisers’ Class Certification Motion] Old – from October 2018 presentation for 2019 budget |
| 10 | 795-01 | n. 27, after “and an additional” through end of footnote | [Document: Advertisers’ Class Certification Motion] Old – from October 2018 presentation for 2019 budget |
| 11 | 795-01 | 10:1-3, between “in 2018, Netflix” and “that after” | [Document: Advertisers’ Class Certification Motion] Old – from 2018 |
| 12 | 795-01 | n. 34, parenthetical after “S. Wang Dep. Tr.” | [Document: Advertisers’ Class Certification Motion] Old – Testimony about events in 2017 (237:3-6) |

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| Row No. | Dkt. No. | Portion of Document Sought to Be Sealed, If Applicable | Basis for Not Sealing |
|---------|----------|--|---|
| 13 | 795-01 | n. 35, parenthetical after "PALM-013460551" | [Document: Advertisers' Class Certification Motion] Old – March 2017 |
| 14 | 795-01 | n. 35, parenthetical after "PX 1711 at 349" | [Document: Advertisers' Class Certification Motion] Old – March 2017 |
| 15 | 795-01 | n. 38, parenthetical after "see also PX 1710" | [Document: Advertisers' Class Certification Motion] Old – May 9, 2019 Public: People-based advertising: https://www.facebook.com/business/news/insights/the-future-of-marketing-people-based-planning-and-measurement Facebook User Matching: https://dl.acm.org/doi/fullHtml/10.1145/3543507.3583311 |
| 16 | 795-01 | n. 38, parenthetical after "S. Wang Dep. Tr. 207:23-208:3" | [Document: Advertisers' Class Certification Motion] Public: Audience Network shows ads to FB users off FB: https://lunio.ai/glossary/facebook-audience-network/ |
| 17 | 795-01 | n. 38, parenthetical after "221:18-24" | [Document: Advertisers' Class Certification Motion] Public: Audience Network shows ads to FB users off FB: https://lunio.ai/glossary/facebook-audience-network/ |
| 18 | 795-03 | Page PALM-012863800, between "everything we collected is still there" and "Per App/Dataset Info" | Old, last edited March 27, 2019 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 19 | 795-03 | Page PALM-012863800, between "video type (ad or content)" and "Snapchat" | Old, last edited March 27, 2019 There is a significant public interest in this conduct, which involves direct targeting of |

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| | | | competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 20 | 795-03 | Top of page PALM-012863801 until "We used it to measure" | Old, last edited March 27, 2019 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 21 | 795-03 | Page PALM-012863801, between "MS team and others" and "Summary of types of analyses conducted" | Old, last edited March 27, 2019 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 22 | 795-04 | Body of email sent at 8:33 AM | Old, July 22, 2016 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 23 | 795-04 | Email addresses of Meta employees as highlighted in exhibit | No position |
| 24 | 795-05 | Email addresses of Meta employees as highlighted in exhibit | No position |
| 25 | 795-06 | Page PALM-004966275, all rows with the exception of "FB Inc. Snap S-1 analyses" row, as highlighted in exhibit | Old, last modified June 23, 2017 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 26 | 795-06 | Email addresses of Meta employees as highlighted in exhibit | No position |
| 27 | 795-07 | All text with the exception of: (a) Page PALM-005538382, bullet | Old, Q1 2017 There is a significant public interest in this conduct, which involves direct targeting of |

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| | | between “Immediate Impact” and “strategic apps” (b) Page PALM-005538382, bullet between “Long term strategic impact” and “in years” as highlighted in exhibit | competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 28 | 795-08 | | Old, August 29, 2017 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 29 | 795-10 | Email addresses of Meta employees as highlighted in exhibit | No position |
| 30 | 795-16 | | Old, November 8, 2017 |
| 31 | 795-17 | | Old, last modified 2/15/2017 |
| 32 | 795-19 | ¶ 17, percentage | Old, from class period ending in December 2020 |
| 33 | 795-19 | ¶ 65, first sentence | Public: https://www.linkedin.com/pulse/facebook-meta-ads-auction-how-works-sarfraz-razzaq/ https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 34 | 795-19 | ¶ 65, between “And the price is set by the auction” and “Q. Okay. So there” | Old (witness left Facebook in July 2019) |
| 35 | 795-19 | n. 64, after “These ads were called “Reach and Frequency” ads.” through end of footnote | Old, from class period ending in December 2020 |
| 36 | 795-19 | page 74-75, between “PALM-007492375, p. 8.” and “(See PALM-007648629, pp. 8, 11, 21).” | Old, from September 2017 |
| 37 | 795-19 | p. 75, between “PALM- | Old, from January 22, 2014, and June 3, 2018 |

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|---------|----------|--|---|
| | | 006846145-154, at 147” and “(See PX 666 (PALM-006077774-796, at 790))” | |
| 38 | 801-01 | 17:18, between “source of” and “of all advertising” | Old, from class period ending in December 2020 |
| 39 | 801-01 | 17:22, between “for just” and “of advertising” | Old, from class period ending in December 2020 |
| 40 | 801-01 | 17:22, between “less than” and “of” | Old, from class period ending in December 2020 |
| 41 | 801-01 | 17:25, between “with only” and “of ad spend” | Old, from class period ending in December 2020 |
| 42 | 801-01 | 17:25, between “just over” and “of advertisers” | Old, from class period ending in December 2020 |
| 43 | 801-01 | 24:23-24, between “among others” and “The named plaintiffs” | Old, from class period ending in December 2020 Meta has not provided compelling reasons for sealing the names and fact of the existence of contracts with these third parties. Many of the reasons provided do not apply to the actual information sought to be sealed here (Seeking to Seal: [REDACTED]) |
| 44 | 801-02 | 85:8, between “about that” and “percent” | Old, from class period ending in December 2020 |
| 45 | 801-02 | 87:18, beginning of line until “percent” | Old, from class period ending in December 2020 |
| 46 | 801-02 | 88:8, between “is your” and “percent” | Old, from class period ending in December 2020 |
| 47 | 801-02 | 88:11, between “the” and “percent” | Old, from class period ending in December 2020 |
| 48 | 801-02 | 88:18-19, between “like” and “Something” | Old, from class period ending in December 2020 |
| 49 | 801-02 | 113:1-4 | Public: https://www.linkedin.com/pulse/facebook-meta-ads-auction-how-works-sarfraz-razzaq/ https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 50 | 801-02 | 113:7-21 | Public: https://www.linkedin.com/pulse/facebook-meta-ads-auction-how-works-sarfraz-razzaq/ https://www.tws-partners.com/2019/12/16/how- |

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| | | | facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 51 | 801-02 | 114:20-115:4 | Public: https://www.linkedin.com/pulse/facebook-meta-ads-auction-how-works-sarfraz-razzaq/ https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 52 | 801-02 | 115:16-116:8 | Public: https://www.linkedin.com/pulse/facebook-meta-ads-auction-how-works-sarfraz-razzaq/ https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 53 | 801-04 | ¶ 2, percentage in third sentence | Old, from class period ending in December 2020 |
| 54 | 801-04 | ¶ 16, final sentence | Old, from class period ending in December 2020 |
| 55 | 801-04 | n. 15 | Old, from class period ending in December 2020 |
| 56 | 801-04 | ¶ 22, between “targeting decreased from” and “percent” | Old, from class period ending in December 2020 |
| 57 | 801-04 | ¶ 22, between “beginning of the Class Period to” and “percent” | Old, from class period ending in December 2020 |
| 58 | 801-04 | Ex. III.B.1.1, percentages | Old, from class period ending in December 2020 |
| 59 | 801-04 | Ex. III.B.1.2 | Old, from class period ending in December 2020 |
| 60 | 801-04 | Ex. III.B.1.3, percentages | Old, from class period ending in December 2020 |
| 61 | 801-04 | ¶ 24, between “During the Class Period” and “percent of ad spend” | Old, from class period ending in December 2020 |
| 62 | 801-04 | ¶ 24, between “During the Class Period, only” and “percent of advertisers” | Old, from class period ending in December 2020 |
| 63 | 801-04 | ¶ 24, between “For example, during the Class Period,” and “percent of ad spend” | Old, from class period ending in December 2020 |
| 64 | 801-04 | ¶ 24, between “During the Class Period,” and “percent of the advertisers” | Old, from class period ending in December 2020 |
| 65 | 801-04 | n. 24, between “Additionally,” and “of ad spend” | Old, from class period ending in December 2020 |

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| 66 | 801-04 | n. 24, between “on Instagram used direct connections targeting,” and “of ad spend” | Old, from class period ending in December 2020 |
| 67 | 801-04 | n. 24, between “on Messenger used direct connections targeting,” and “of ad spend on Audience Network” | Old, from class period ending in December 2020 |
| 68 | 801-04 | n. 25, between “Additionally,” and “advertisers on Instagram” | Old, from class period ending in December 2020 |
| 69 | 801-04 | n. 25, between “Instagram used direct connections targeting,” and “of advertisers on Messenger” | Old, from class period ending in December 2020 |
| 70 | 801-04 | n. 25, between “Messenger used direct connections targeting, and” and “of advertisers on Audience Network” | Old, from class period ending in December 2020 |
| 71 | 801-04 | n. 26, between “Additionally,” and “ad spend on Instagram” | Old, from class period ending in December 2020 |
| 72 | 801-04 | n. 26, between “Instagram used either direct connections targeting or friends of connections targeting,” and “of ad spend on Messenger” | Old, from class period ending in December 2020 |
| 73 | 801-04 | n. 26, between “Messenger used either direct connections targeting or friends of connections targeting, and” and “of ad spend on Audience Network” | Old, from class period ending in December 2020 |
| 74 | 801-04 | n. 27, between “Additionally,” and “advertisers on Instagram” | Old, from class period ending in December 2020 |
| 75 | 801-04 | n. 27, between “Instagram used either direct connections targeting or friends of connections | Old, from class period ending in December 2020 |

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| | | targeting,” and “of advertisers on Messenger” | |
| 76 | 801-04 | n. 27, between “Messenger used either direct connections targeting or friends of connections targeting, and” and “of advertisers on Audience Network” | Old, from class period ending in December 2020 |
| 77 | 801-04 | n. 44, between “They’re a small part of Facebook’s ad revenue, about” and “percent” | Old, from class period ending in December 2020 |
| 78 | 801-04 | Ex. IV.C.1.1 | Old, from class period ending in December 2020 |
| 79 | 801-04 | ¶ 41, between “Exhibit IV.C.1.2 shows that” and “This suggests that” | Old, from class period ending in December 2020 |
| 80 | 801-04 | Ex. IV.C.1.2 | Old, from class period ending in December 2020 |
| 81 | 801-04 | n. 84, between “They’re a small part of Facebook’s ad revenue, about” and “percent” | Old, from class period ending in December 2020 |
| 82 | 801-04 | Ex. IV.C.4.1 | Old, from class period ending in December 2020 |
| 83 | 801-04 | ¶ 64, between “similar to a” and “where advertisers bid for each individual ad placement” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 84 | 801-04 | ¶ 64, between “highest ‘quality’ adjusted bid wins” and “Therefore,” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 85 | 801-04 | ¶ 64, between “valuations of the impression being auctioned” and “In other words,” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 86 | 801-04 | n. 118, between “the auction mechanism is” and “which is the minimum amount” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 87 | 801-04 | n. 118, between “set their bid at to win the auction” and “See, for example” | Public: https://a.sfdcstatic.com/content/dam/www/ocms/assets/pdf/datasheets/sc_decode-thefacebook-auction.pdf |
| 88 | 801-04 | ¶ 65, between “in fact | Public: https://www.tws- |

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| | | shared by the” and “that Meta uses” | partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 89 | 801-04 | ¶ 65, between “winning price in” and “such as participating” | Public: https://partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 90 | 801-04 | ¶ 65, Exhibit VI.A.1 title, between “Meta’s” and “and Car” | Public: https://partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 91 | 801-04 | ¶ 65, Exhibit VI.A.1, lefthand column name, after “Meta’s” | Public: https://partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 92 | 801-04 | ¶ 67, between “striking because” and “are ‘conceptually similar’” | Public: https://partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 93 | 801-04 | ¶ 67, between “As such, in both a” and “and in a multilateral negotiation” | Public: https://partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 94 | 801-04 | n. 123, beginning of footnote until “See also, Thomas” | Public: https://www.jstor.org/stable/3590361 |
| 95 | 801-04 | n. 124 | Public: https://www.jstor.org/stable/3590361 |
| 96 | 801-04 | ¶ 69, between “specific discounts can range anywhere from” and “Meta ad credits” | Old, August 25, 2013 |
| 97 | 801-04 | ¶ 69, between “In 2018, Meta budgeted” and “for ‘Overall Ad Credits’” | Old, 2018 |
| 98 | 801-04 | ¶ 69, between “A portion of this” and “was earmarked” | Old, 2018 |
| 99 | 801-04 | n. 125, between “range from” and “%.)” | Old, August 25, 2013 |
| 100 | 801-04 | ¶ 70, between “reached as high as” and “percent during the class period.” | Old, from class period ending in December 2020 |
| 101 | 801-04 | ¶ 71, between “bespoke agreements with Meta” and “Some advertisers have” | Meta has not provided compelling reasons for sealing this information. Meta discloses it uses ad discounts and credits (see, e.g., |

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| | | | https://www.facebook.com/business/help/131439120265224?id=174106774399298 |
| 102 | 801-04 | ¶ 71, between “negotiated credits” and “Across these agreements.” | Old, from 2015, 2017, 2019, 2020 |
| 103 | 801-04 | ¶ 71(a), after “magnitude of the” through end of sentence | Old, from 2017 |
| 104 | 801-04 | nn. 132-136 | Old, from 2015, 2017, 2019, 2020 |
| 105 | 801-06 | 1687:1-4, from beginning of line 1687:1 until “With this agreement in place” | Old, from February 25, 2020 |
| 106 | 801-06 | 1688:13-15, after “could be construed as” through end of paragraph | Old, from 2015 |
| 107 | 801-06 | n. 6194 | Old, from January 28, 2015 |
| 108 | 801-06 | n. 6195 | Old, from August 7, 2015 |
| 109 | 801-06 | n. 6197 | Old, from May 1, 2013 Old, from July 16, 2015 |
| 110 | 801-07 | 145:20, between “few was” and “percent” | Old, from class period ending in December 2020 |
| 111 | 801-07 | 145:20-21, between “down to” and “percent” | Old, from class period ending in December 2020 |
| 112 | 801-07 | 146:4, between “you know,” and “percent” | Old, from class period ending in December 2020 |
| 113 | 801-07 | 146:5, between “percent.” and “percent is certainly few” | Old, from class period ending in December 2020 |
| 114 | 801-07 | 150:3, between “believe the” and “or the – I” | Old, from class period ending in December 2020 Meta has not provided compelling reasons for sealing the names and fact of the existence of contracts with these third parties. Many of the reasons provided do not apply to the actual information sought to be sealed here |
| 115 | 801-07 | 150:4, between “cited the” and “contract” | Old, from class period ending in December 2020 Meta has not provided compelling reasons for sealing the names and fact of the existence of contracts with these third parties. Many of the reasons provided do not apply to the actual information sought to be sealed here |
| 116 | 801-11 | 91:16-17, between “at 0480” and “The predicate task” | Old, from 2014-2015 |

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|---------|-----------------|--|--|
| 117 | 801-11 | 110:10-17, between “would likely have” and “PALM-006799270” | Old, from 2015 |
| 118 | 810-03 & 813-03 | n. 24, between “Dr. Tucker states:” and “ <i>Id.</i> Dr. Tucker’s” | Old, from class period ending in December 2020 |
| 119 | 810-03 & 813-03 | n. 24, between “age targeting is associated with over” and “of ad spend” | Old, from class period ending in December 2020 |
| 120 | 810-03 & 813-03 | n. 24, between “geographic targeting is associated with over” and “of ad spend” | Old, from class period ending in December 2020 |
| 121 | 810-03 & 813-03 | n. 24, between “There is” and “ad spend associated only with the Custom” | Old, from class period ending in December 2020 |
| 122 | 810-03 & 813-03 | ¶ 30, between “associated with over” and “of ad spend, and geographic targeting” | Old, from class period ending in December 2020 |
| 123 | 810-03 & 813-03 | ¶ 30, between “geographic targeting was associated with over” and “of ad spend.” | Old, from class period ending in December 2020 |
| 124 | 810-03 & 813-03 | n. 26, between “Dr. Tucker states:” and “ <i>Id.</i> Dr. Tucker’s statement is” | Old, from class period ending in December 2020 |
| 125 | 810-03 & 813-03 | ¶ 48, between “As shown in Figure 2 below, a” and “of change” | Old, from 2016 |
| 126 | 810-03 & 813-03 | ¶ 48, between “quantity of ads sold leads to a” and “change in Facebook’s capital” | Old, from 2016 |
| 127 | 810-03 & 813-03 | ¶ 48, Figure 2 | Old, from 2016 |
| 128 | 810-03 & 813-03 | ¶ 85, between “opposite result” and “Thus, Facebook advertisers” | Old, from class period ending in December 2020 |
| 129 | 810-03 & 813-03 | ¶ 86, between “is conservative” and “(See Figures A3 and A4 in Appendix II.)” | Old, from class period ending in December 2020 |
| 130 | 810-03 & | ¶ 87, final sentence | Old, from class period ending in December 2020 |

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| | 813-03 | | |
| 131 | 810-03 & 813-03 | n. 99, between “accounted for” and “of Facebook’s” | Old, from class period ending in December 2020 |
| 132 | 810-03 & 813-03 | ¶ 114, between “As shown in the figure, Facebook’s CTRs” and “until around 2016” | Old, from class period ending in December 2020 |
| 133 | 810-03 & 813-03 | ¶ 114, between “In the Class Period, Facebook’s CTRs” and “These results” | Old, from class period ending in December 2020 |
| 134 | 810-03 & 813-03 | ¶ 114, between “Given the” and “CTR in the Class Period” | Old, from class period ending in December 2020 |
| 135 | 810-03 & 813-03 | ¶ 114, Figure 5 | Old, data ends January 2022 |
| 136 | 810-03 & 813-03 | ¶ 140, between “in markets where sellers use” and “this downward pressure” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 137 | 810-03 & 813-03 | ¶ 142, between “by an advertiser in the Class Period is” and “In addition” | Old, from class period ending in December 2020 |
| 138 | 810-03 & 813-03 | ¶ 142, between “In addition” and “of advertisers purchased” | Old, from class period ending in December 2020 |
| 139 | 810-03 & 813-03 | ¶ 142, between “purchased at least” and “Facebook impressions in the Class Period” | Old, from class period ending in December 2020 |
| 140 | 810-03 & 813-03 | ¶ 142, between “advertiser that purchased” and “Facebook impressions purchased at least” | Old, from class period ending in December 2020 |
| 141 | 810-03 & 813-03 | ¶ 146, between “affect the winning price in” and “I never stated” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 142 | 810-03 & 813-03 | ¶ 146, between “affecting prices in” and “Instead, I argued” | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 143 | 810-03 | ¶ 147, between “in her | Public: https://www.tws- |

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| Row No. | Dkt. No. | Portion of Document Sought to Be Sealed, If Applicable | Basis for Not Sealing |
|---------|-----------------|--|---|
| | & 813-03 | opinion, show that" and "and multilateral negotiations are" | partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 144 | 810-03 & 813-03 | ¶ 147, between "differences between auctions and negotiations" and "Yet, she fails to quote" | Public: https://www.jstor.org/stable/3590361 |
| 145 | 810-03 & 813-03 | ¶ 147, between "stated on the same page" and "Dr. Tucker further references" | Public: https://www.jstor.org/stable/3590361 |
| 146 | 810-03 & 813-03 | n. 172 | Public: https://www.jstor.org/stable/3590361 |
| 147 | 810-03 & 813-03 | ¶ 148, between "what I expect under Facebook's actual" and "mechanism, where no" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 148 | 810-03 & 813-03 | ¶ 148, between "above, under Facebook's actual" and "mechanism, the alleged monopolizing" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 149 | 810-03 & 813-03 | ¶ 148, between "markets where sellers use" and "this upward pressure" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 150 | 810-03 & 813-03 | ¶ 149, between "dealership price negotiations and Meta's" and "mechanism as discussed above" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 151 | 810-03 & 813-03 | ¶ 149, between "bidder's ad and the user' for Meta's" and "with (2)" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 152 | 810-03 & 813-03 | ¶ 149, between "negotiations absent from Meta's" and "and would not be captured" | Public: https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/ |
| 153 | 810-03 & 813-03 | ¶ 154, between "that Meta budgeted" and "in 2018" | Old, from 2018 |
| 154 | 810-03 & 813-03 | ¶ 154, between "reveals that only" and "was earmarked" | Old, from 2018 |
| 155 | 810-03 | ¶ 154, between "External | Old, from 2018 |

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| | & 813-03 | Parties' while" and "was allocated" | |
| 156 | 810-03 & 813-03 | ¶ 154, between "members were less than" and "of Meta's advertising revenue" | Old, from class period ending in December 2020 |
| 157 | 810-03 & 813-03 | n. 191, between "stick with staying at" and "of total ad revenue" | Old, from December 5, 2015 projecting for 2018/2019 |
| 158 | 810-03 & 813-03 | ¶ 155, between "reached as high as" and "percent during the class period." | Old, from class period ending in December 2020 |
| 159 | 810-03 & 813-03 | ¶ 155, between "produced by Facebook, out of" and "that purchased ads" | Old, from class period ending in December 2020 |
| 160 | 810-03 & 813-03 | ¶ 155, between "in the Class Period, just" and "of those advertisers only purchased" | Old, from class period ending in December 2020 |
| 161 | 810-03 & 813-03 | n. 195 | Old, from August 22, 2018 |
| 162 | 810-03 & 813-03 | Figure A1 | Old, from class period ending in December 2020 |
| 163 | 810-03 & 813-03 | Figure A2 | Old, from 2016 - 2022 |
| 164 | 810-03 & 813-03 | Figure A3 | Old, from 2016 - 2022 |
| 165 | 810-03 & 813-03 | Figure A4 | Old, from December 2016 – June 2022 |
| 166 | 810-03 & 813-03 | Figure A5 | Old, from class period ending in December 2020 |
| 167 | 813-01 | 7:5-6, between "stating that" and "and discussing" | Old, from August 2018 |
| 168 | 813-01 | 7:7, between "discussing which" and "to" | Old, from August 2018 |
| 169 | 813-01 | 7:7-8, between "to" and "Meta internally measured" | Old, from 2018 |
| 170 | 813-01 | 9:18-19, between "clickthrough rates and," and "Williams Reply" | Old, from class period ending on December 31, 2020 |

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| Row No. | Dkt. No. | Portion of Document Sought to Be Sealed, If Applicable | Basis for Not Sealing |
|---------|--|---|---|
| 171 | 824-03 | 6:16-17, between “company that” and “—a technological” | Old, from August 2017 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 172 | 824-03 | 6:18-19, between “like Facebook’s—” and “PALM-008758432” | Old, from August 2017 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 173 | 824-03 | 6:20-23, between “PALM-008758435-36.” and “ <i>Id.</i> Dr. Jakobsson” | Old, from August 2017 There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws |
| 174 | Errata to Advertiser Class Rebuttal Report of Catherine Tucker | Language in “Original Text” and “Corrected Text” columns | Old, from 2015 to 2017 Meta has not provided compelling reasons for sealing the names and fact of the existence of contracts with these third parties. Many of the reasons provided do not apply to the actual information sought to be sealed here. |

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19, 2024, in Austin, Texas.

/s/ Brian J. Dunne

Brian J. Dunne